

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 6:16CR35
	§	JUDGE CLARK
FAWAZ OLARENWAJU ANIMASAUN (01)	§	
a/k/a RICHARDSON6567	§	
a/k/a LANRAY LARRY	§	
a/k/a LARRY HOOVER	§	
a/k/a SLIM HUSSTLE OLANRAYWAJU	§	

ELEMENTS OF THE OFFENSE

COMES NOW, the United States of America, by and through the United States Attorney for the Eastern District of Texas, and files this pleading summarizing the elements of the offense to which the defendant intends to enter a plea of guilty to Count One of the Indictment.

Title 18, United States Code, Section 1349, makes it a crime for anyone to conspire to commit an offense under Chapter 63 of Title 18.

The defendant is charged with conspiring to commit bank fraud, a violation of 18 U.S.C. § 1344(2) and wire fraud, a violation of 18 U.S.C. § 1343. Title 18, United States Code, Section 1344(2) makes it a crime for anyone to knowingly execute a scheme or artifice to obtain any monies, funds, assets, securities, or other property owned by or under the custody or control of an insured financial institution by means of false or fraudulent pretenses, representations, or promises. Title 18, United States Code, Section 1343 makes it a crime for anyone to use interstate or foreign wire communications in carrying out a scheme to defraud.

To establish that the defendant is guilty of conspiracy to commit bank fraud and wire fraud, the government must prove the following beyond a reasonable doubt:

First: That two or more persons, directly or indirectly, reached an agreement to execute or attempt to execute a scheme or artifice to obtain money, funds, assets, securities, or other property owned by or under the custody or control of an insured financial institution by means of materially false or fraudulent pretenses, representations, or promises or to transmit and cause to be transmitted by means of wire communication in interstate or foreign commerce any writings, signs, signals, pictures, or sounds for the purpose of executing a scheme or artifice to defraud or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises;

Second: That the defendant knew of the unlawful purpose of the agreement;
and

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

Respectfully submitted,

BRIT FEATHERSTON
ACTING UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Elements of the Offense was served on counsel of record for defendant via the court's CM/ECF on this the 9th day of January, 2017.

/s/ Nathaniel C. Kummerfeld
Nathaniel C. Kummerfeld